

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: Chapter 11

FTX TRADING LTD., *et al.*,<sup>1</sup> Case No. 22-11068 (JTD)

Debtors. (Jointly Administered)

Ref. No. \_\_

**ORDER SUSTAINING DEBTORS' SIXTY-FIRST (NON-SUBSTANTIVE)  
OMNIBUS OBJECTION TO CERTAIN  
SUPERSEDED CLAIMS (CUSTOMER CLAIMS)**

Upon the sixty-first omnibus objection (the “Objection”)<sup>2</sup> of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the Superseded Claims set forth in Schedule 1 attached hereto; and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further

<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Superseded Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled "Surviving Claims" identified on Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors' further objections on any substantive or non-substantive grounds.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors' right to object on any other grounds that the Debtors discover is preserved.
4. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Superseded Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.
5. To the extent a response is filed regarding any Superseded Claim, each such Superseded Claim, and the Objection as it pertains to such Superseded Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order

will be deemed a separate order with respect to each Superseded Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtor may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtor pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: \_\_\_\_\_  
Wilmington, Delaware

\_\_\_\_\_  
The Honorable John T. Dorsey  
United States Bankruptcy Judge

**SCHEDULE 1**

**Superseded Claims**

FTX Trading Ltd. 22-11068 (JTD)  
Sixty-First Omnibus Claims Objection  
Schedule 1 - Superseded Claims

Claim Number	Claims to be Disallowed			Surviving Claims				
	Name	Debtor	Tickers	Claim Number	Name	Debtor	Tickers	Ticker Quantity
55462	Name on file	FTX Trading Ltd.		94681	Name on file	FTX Trading Ltd.		
	BUSD		303,000.2000000000000000			TRX		0.0006280000000000
	TRX		0.0006280000000000			USD		15,847,257.61723555000000
	USD		13,680,000.1755795548100000			USDT		2,247,292.35419851000000
	USDC		1,863,957.0000000000000000					
	USDT		2,247,171.3541985075000000					
55310	Name on file	FTX Trading Ltd.		56734*	Name on file	FTX Trading Ltd.		
	1INCH-PERP		0.0000000000000000			1INCH-PERP		0.0000000000000000
	ALEPH		15,570.0678500000000000			ALEPH		15,570.0678500000000000
	ATLAS		50,995.9500000000000000			ATLAS		50,995.9500000000000000
	ATOM		1,038.5370780000000000			ATOM		1,038.5370780000000000
	AVAX					AVAX		0.0000000000000000
	AXS-PERP		0.0000000000000000			AXS-PERP		0.0000000000000000
	BNB		0.0000000000000000			BNB		0.0000000000000000
	BNB-PERP					BNB-PERP		0.0000000000000000
	BTC		-0.0000000000000037			BTC		0.0000000000000000
	BTC-PERP		0.0000000000000000			BTC-PERP		-0.0000000000000037
	COMP-PERP		0.0000000000000000			COMP-PERP		0.0000000000000000
	DEFI-PERP		0.0000000000000000			DEFI-PERP		0.0000000000000000
	DOT		4,501.5692822018100000			DOT		4,501.5692822018100000
	ETH		0.0000000000000085			ETH		0.0000000000000000
	ETH-PERP		1,397.8031889229600000			ETH-PERP		0.0000000000000085
	ETHW		0.0000000000000000			ETHW		1,397.8031889229600000
	FIL-PERP		0.0000000000000000			FIL-PERP		0.0000000000000000
	FLOW-PERP		0.0000000000000000			FLOW-PERP		0.0000000000000000
	FTM		6,952.0000000000000000			FTM		6,952.0000000000000000
	FTT		2,237.2932961523700000			FTT		2,237.2932961523700000
	FTT-PERP		0.0000000000000000			FTT-PERP		0.0000000000000000
	GRT		49,696.2828000000000000			GRT		49,696.2828000000000000
	GRT-PERP		0.0000000000000000			GRT-PERP		0.0000000000000000
	HNT		2,764.0422482500000000			HNT		2,764.0422482500000000
	LINK		6,324.0427756700000000			LINK		6,324.0427756700000000
	MANA		735.5170550600000000			MANA		735.5170550600000000
	MATIC					MATIC		0.0000000000000000
	MOB		0.8726500000000000			MOB		0.8726500000000000
	RNDR		4,241.4000000000000000			RNDR		4,241.4000000000000000
	RUNE		12,894.9879545000000000			RUNE		12,894.9879545000000000
	SAND		97.3449500000000000			SAND		97.3449500000000000
	SOL					SOL		0.0000000000000000
	SRM		91,761,20041000000000			SRM		91,761,20041000000000
	SRM_LOCKED		691,238,79959000000000			SRM_LOCKED		691,238,79959000000000
	STG		29,351.1178125000000000			STG		29,351.1178125000000000
	SUSHI		3,049.7131250000000000			SUSHI		3,049.7131250000000000
	UNI		1,659.7488000000000000			UNI		1,659.7488000000000000
	USD		-1,087,929.02782454000000			USD		-1,087,929.02782454000000
	USDT		5,500.0000000096200000			USDT		5,500.0000000096200000